



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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November 19, 2007

John Brent
Fort Benning Directorate of Public Works
Environmental Management Division
Meloy Hall (Building 6), Room 310
Fort Benning, Georgia 31905

SUBJECT: Final Environmental Impact Statement for BRAC 2005 and Transformation
Actions at Fort Benning, Georgia; CEQ Number 20070444

Dear Mr. Brent:

The U.S. Environmental Protection Agency (EPA) has reviewed the referenced Final Environmental Impact Statement (EIS) in accordance with its responsibilities under Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act (NEPA). The Department of the Army (Army) proposes to implement several actions related to the reorganization and overall military transformation process at Fort Benning in Chattahoochee and Muscogee Counties, Georgia, and Russell County, Alabama. The specific interrelated actions that form the basis for this EIS include: 1) Base Realignment and Closure 2005 recommendations; 2) Army Modular Force transformation activities; 3) Global Defense Posture Realignment actions related to relocation of overseas assets; and 4) other personnel movements. The total personnel gain at Fort Benning due to the proposed actions would be approximately 14,069, including 4,486 military, 8,357 students, and 1,226 civilian employees.

EPA's primary concerns raised in the review of the Draft EIS included potential direct and/or indirect impacts to aquatic habitat, wetlands, water quality associated with clearing operations and construction, and the development of new stream/wetland crossings in new training areas. We recommended development of a comprehensive monitoring program to ensure that the ongoing impacts from military training are assessed and appropriately addressed/mitigated once identified. EPA appreciates inclusion of Appendix G, Mitigation and Monitoring Plan, in the Final EIS. Several mitigation measures are described in the Final EIS, including a commitment to hire specific "environmental monitors" who would monitor compliance and the effectiveness of various mitigation measures over the entire construction period and into the operational and maintenance phase. We support this approach as well as many of the other measures proposed to mitigate for adverse project impacts to wetlands, streams, and water quality. The Final EIS also states that the Army would place information about the mitigation and monitoring plan on the Fort Benning website. To ensure the fullest use of this public outreach mechanism, we recommend including obvious links on the Fort Benning website to allow for noise complaints, the availability of training schedules, and access to monitoring/mitigation updates.

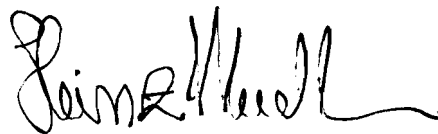
With regard to stream and wetland impacts, we continue to encourage appropriate functional replacement for those wetland and stream functions impacted by the project. Such replacement could involve on-site mitigation as close to the impact site as possible, off-site mitigation within the watershed, or a combination of both approaches. Mitigation should include restoration, enhancement or preservation of wetlands and stream reaches that have been degraded or other watershed improvements.

In the Draft EIS, EPA also raised concerns about potential changes in air quality associated with the proposed action and recommended several actions that Fort Benning could implement during construction and operations to assist the Columbus metropolitan area in meeting air quality standards in the future. In particular, we recommended that the Army develop additional transportation management strategies for Fort Benning to address the transportation system deficiencies that will be created by the transformation actions. In the Final EIS, the Army provided a number of responses to these comments, including that managers would be encouraged, where feasible, to employ travel demand management (TDM) tools to minimize significant transportation impacts; however, no specific measures were included. Given the potential designation of the Columbus area as nonattainment for the fine particulate matter standard, EPA continues to recommend that Fort Benning develop a comprehensive alternative transportation program, promoting telecommuting, the use of mass transit, and car pooling, and establishing no-cost or low-cost mass transit (possibly hybrid electric or natural gas powered). These measures would serve to help the Columbus area maintain or improve air quality and improve level-of-service problems at key intersections by decreasing the expected traffic demand. We believe the details regarding such a program could be incorporated in the Fort Benning Comprehensive Traffic Study, which is currently under preparation.

In summary, while we continue to believe that additional works should be done toward the development of a comprehensive transportation program, EPA supports the other mitigation measures and monitoring programs as described in the Final EIS. We appreciate the Army's commitment to adhere to these best management practices to protect water quality and aquatic habitat. EPA also recommends inclusion of these mitigation commitments in the Record of Decision (ROD) for the project.

We appreciate the opportunity to review the proposed action and look forward to continuing our collaborative efforts as the Army finalizes the ROD and examines alternative transportation approaches. Please contact Ben West of my staff at (404) 562-9643 if you have any questions or want to discuss our comments further.

Sincerely,

A handwritten signature in black ink, appearing to read "Heinz J. Mueller", with a stylized, flowing script.

Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management